UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Citibank August 11, 2020 Wire Transfers

No. 20 Civ. 06539 (JMF)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, this action concerns funds that were paid on August 11, 2020 to entities, including non-Defendant lenders, customers, funds, CLOs, or accounts (the "Non-Defendant Funds") managed or advised by Brigade Capital Management, LP, HPS Investment Partners, LLC, Symphony Asset Management, LLC, Bardin Hill Loan Management LLC, Investcorp Credit Management US LLC, Greywolf Loan Management LP, Zais Group LLC, Allstate Investment Management Company, Medalist Partners Corporate Finance LLC, Tall Tree Investment Management LLC, and New Generation Advisors LLC (collectively, the "Defendants");

IT IS HEREBY AGREED AND ORDERED THAT:

- 1. Each Defendant will comply with any and all applicable orders of the Court and take all reasonable steps to direct and/or request that the various Non-Defendant Funds managed or advised by such Defendant comply with any and all applicable orders of the Court.
- 2. Each Defendant will not assert that orders of the Court do not apply to the Non-Defendant Funds managed or advised by such Defendant.
- 3. Each Defendant will request that the Non-Defendant Funds managed or advised by such Defendant inform the Defendant promptly if they do not intend on complying with applicable orders of the Court, and each Defendant will inform Citibank, N.A., through counsel, promptly of the receipt of any such notice.

Dated: August 28, 2020 New York, New York

MAYER BROWN LLP

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: <u>/s/ Matthew D. Ingber</u>

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Dated: August 31, 2020 New York, New York By: /s/ Benjamin Finestone
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Attorneys for Defendants

SO ORDERED:

HON. JESSE M. FURMAN UNITED STATES DISTRICT JUDGE